

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually and on)
behalf of all others similarly situated,)

Plaintiff,)

vs.)

SONUS NETWORKS, INC., HASSAN)
AHMED, STEPHEN NILL,)

Defendants.)

(Additional Captions Follow)

Case No. 1:04-cv-10294-DPW

**BELLAND GROUP'S NOTICE OF MOTION AND MOTION TO CONSOLIDATE,
TO BE APPOINTED LEAD PLAINTIFF, AND FOR APPROVAL OF
ITS SELECTION OF CO-LEAD COUNSEL**

MICHELLE TREBITSCH, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

) Case No. 1:04-cv-10307-DPW

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INFORMATION DYNAMICS, LLC, on
behalf of itself and all others similarly
situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., PAUL. R.
JONES, EDWARD N. HARRIS, J.
MICHAEL O'HARA, HASSAN M.
AHMED and STEPHEN J. NILL,

Defendants.

) Case No. 1:04-cv-10308-DPW

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PETER KALTMAN, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., RUBIN
GRUBER, HASSAN AHMED and
STEPHEN NILL,

Defendants.

) Case No. 1:04-cv-10309-DPW

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SAMANTHA DEN, individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10310-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL)
)
)
Defendants.)

RONALD KASSOVER, on behalf of the Ronald Kassover IRA and all others similarly situated,) Case No. 1:04-cv-10329-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M. AHMED, STEPHEN J. NILL,)
)
)
Defendants.)

STEVE L. BAKER, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10333-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,)
)
)
Defendants.)

MICHAEL KAFFEE, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10345-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,)
)
)
Defendants.)

HAIMING HU, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10346-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL)
)
)
Defendants.)

CHARLES STARBUCK, Individually and himself and all others similarly situated,) Case No. 1:04-cv-10362-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,)
)
)
Defendants.)

SANUEL HO, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10363-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN)
AHMED, and STEPHEN NILL,)
)
Defendants.)

JEFFREY C. RODRIGUES, Individually on behalf of all others similarly situated,) Case No. 1:04-cv-10364-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M.)
AHMED, and STEPHEN J. NILL,)
)
Defendants.)

ROBERT CONTE and MARK RESPLER, on behalf of himself and all other similarly situated,) Case No. 1:04-cv-10382-DPW
)
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN)
AHMED, and STEPHEN NILL,)
)
Defendants.)

WHEATON ELECTRICAL SERVICES) Case No. 1:04-cv-10383-DPW
RETIREMENT 401 K PROFIT SHARING)
PLAN, on behalf of itself and all others)
similarly situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN)
AHMED and STEPHEN J. NILL,)
)
Defendants.)

BRIAN CLARK, Individually and on) Case No. 1:04-cv-10454-DPW
behalf of all others similarly situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., PAUL R.)
JONES, EDWARD N. HARRIS, J.)
MICHAEL O'HARA, HASSAN M.)
AHMED, and STEPHEN J. NILL,)
)
Defendants.)

SHEILA BROWNELL, Individually and on) Case No. 1:04-CV-10597-DPW
behalf of all others similarly situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN)
AHMED and STEPHEN NILL,)
)
Defendants.)

SAVERIO PUGLIESE, on behalf of) Case No. 1:04-cv-10612-DPW
himself and all others similarly situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M.)
AHMED, STEPHEN J. NILL,)
)
Defendants.)
)

DAVID V. NOCITO, on behalf of) Case No. 1:04-cv-10623-DPW
himself and all others similarly situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M.)
AHMED, and STEPHEN J. NILL,)
)
Defendants.)
)

PLEASE TAKE NOTICE that Plaintiffs Grace I. Belland, Leopoldo L. Mestre, Jacob I. Sherman, Scott L. Dunkley, Abdul S. Budhinani, and Sean P. McCarthy, collectively, the “Belland Group,” hereby move the Court for an Order, pursuant to Rule 42 of the Federal Rules of Civil Procedure, consolidating all related actions and, pursuant to Section 21D(a)(3)(B)(i) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B)(i), appointing them Lead Plaintiff in the consolidated action. In addition, the Belland Group moves this Court for an Order, pursuant to Section 21D(a)(3)(B)(v) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B)(v), approving their selection of Co-Lead Counsel.

The Belland Group makes this motion based on the complaints filed herein, the memorandum of law submitted contemporaneously herewith, the Declaration of Theodore M. Hess-Mahan, executed on April 12, 2004, and on all other pleadings, motions, and orders in this action.

Dated: April 12, 2004

SHAPIRO HABER & URMYY LLP

/s/Theodore M. Hess-Mahan

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Proposed Co-Lead Counsel for the Belland Group and the Class

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